



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

October 24, 2003

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Kraft Foods, North America, Inc. / 113-17246-00017

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 9/16/03



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Ms. Leesa Sturgis  
Kraft Foods North America, Inc.  
151 West Ohio Street  
Kendallville, Indiana 46755

**October 24, 2003**

Re: 113-17246-00017  
First Significant Permit Revision to:  
FESOP 113-14608-00017

Dear Ms. Sturgis:

Kraft Foods North America, Inc., was issued a FESOP on March 13, 2003 for a confectionary processing plant. A letter requesting a revision to this permit was received on May 7, 2003. Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

This modification consists of the following:

- (a) Construction of a central vacuum system with one (1) baghouse for controlling plant air emissions;
- (b) Construction of a confectionary process line 13 producing marshmallow bits, with a dust collector as control; and
- (c) Modification of three (3) natural gas fired boilers (identified as EU1, EU2 and EU3) to burn No. 2 fuel oil as back-up fuel. The three (3) boilers will no longer use No. 6 fuel oil as back-up fuel. EU1 and EU2 each have a maximum heat input capacity of 8.10 MMBtu per hour; and boiler EU3 has a maximum heat input capacity of 9.0 MMBtu per hour.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,  
**Original signed by**

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

#### Attachments

#### ERG/SD

cc: File - Noble County  
U.S. EPA, Region V  
Noble County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Doyle Houser  
Compliance Data Section - Karen Nowak  
Administrative and Development - Sara Cloe  
Technical Support and Modeling - Michele Boner



Joseph E. Herman  
Governor

Lori F. Kaplan  
Commissioner

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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Kraft Foods North America, Inc.  
151 West Ohio Street  
Kendallville, Indiana 46755**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F113-14608-00017	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 13, 2002  Expiration Date: March 13, 2007

  

First Significant Permit Revision No.: 113-17246-00017		Pages Affected: 5, 6, 25 through 32, 36
Issued by: <b>Original signed by</b> Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: <b>October 24, 2003</b>	

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Kraft Foods North America, Inc.  
Kendallville, Indiana  
Permit Reviewer: ERG/AB

1st Significant Permit Revision No.: 113-17246-00017  
Revised by: ERG/SD

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Certification Form3  
Emergency Occurrence Form  
Quarterly Report Form  
Quarterly Deviation and Compliance Monitoring Report Form

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

---

The Permittee owns and operates a confectionary source.

Authorized individual:	Nicholas Coburn
Source Address:	151 W. Ohio Street, Kendallville, Indiana 46755
Mailing Address:	151 W. Ohio Street, Kendallville, Indiana 46755
SIC Code:	2064
Source Location Status:	Noble
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) natural gas fired boilers identified as EU1 and EU2, constructed in 1949 and each rated at 8.1 million Btu/hour. Boilers EU1 and EU2 use either No. 6 fuel oil or No. 2 fuel oil as a back up fuel.
- (b) One (1) natural gas fired boiler, identified as EU3, constructed in 1961 and rated at 9.0 million Btu/hr. Boiler EU3 uses either No. 6 fuel oil or No. 2 fuel oil as a back up fuel.
- (c) Marbits Line (Lines 6, 7, and 8) sugar storage bin with two (2) baghouses.
- (d) Dried Marshmallow Bits Production Department (Lines 6-8).
  - (1) Line 6 & 7 kitchen area - five (5) cook kettles with wet rotoclone.
  - (2) Line 6 Production.
    - (A) Extruder, starch drum, cooling drum with baghouse.
    - (B) Vac-U-Max transfer system with baghouse.
    - (C) Proctor Schwartz dryer with baghouse.
  - (3) Line 7 Production.
    - (A) Extruder, starch drum, cooling drum with baghouse.
    - (B) Vac-U-Max transfer system with baghouse.

- (C) Proctor-Schwartz dryer with baghouse.
- (4) Line 8 Production.
  - (A) Extruder, starch drum, cooling drum with baghouse.
  - (B) Vac-U-Max transfer system with baghouse.
  - (C) Proctor Schwartz dryer with baghouse.
- (e) A confectionary process line 13 producing marshmallow bits, with a dust collector as control.
- (f) A central vacuum system with one (1) baghouse for controlling plant air emissions.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Caramels Department
  - (1) System a-b; four (4) cook kettles with wet rotoclones.
  - (2) System c-d; four (4) cook kettles with wet rotoclones.
- (b) Sugar Handling
  - (1) Four (4) storage silos for rail car unloading with baghouse.
  - (2) Carmel/Marshmallow sugar in plant storage bin with baghouse.
  - (3) Two (2) sugar receiving hoppers for marshmallow lines 8-12 with baghouse on each.
  - (4) Two (2) sugar weigh hoppers for caramel department and (2) sugar weigh hoppers for marshmallow lines (Lines 1-5).
- (c) Marshmallow Production Department (Lines 1-5).
  - (1) Kitchen Area.
    - (A) Lines 1 & 2 - four (4) cook kettles with wet rotoclones.
    - (B) Lines 3 & 4 and the Creme line - four (4) cook kettles with wet rotoclones.
  - (2) Extruders, starch drums, cooling drums, baggers and one (1) starch silo, with seven (7) baghouses.
  - (3) One (1) starch bag dump station with (1) baghouse.
  - (4) Four (4) Vac-U-Max transfer systems with four (4) baghouses.
- (d) Clean-up systems.

- (1) Marshmallow extrusion area Spencer Vacuum Cleaner System with cyclone and bag filter.
  - (2) Marbit extrusion area Spencer Vacuum Cleaner System with cyclone and bag filter.
- (e) Marshmallow Production Department (Lines 9 - 12)
  - (1) Line 9 - 12 kitchen area - nine (9) cook kettles with two (2) wet rotoclones.
  - (2) Extruders, starch drums, cooling drums for lines 9-12 with four (4) baghouses.
  - (3) Five (5) Vac-U-Max transfer systems with four (4) baghouses.
  - (4) Baggers for lines 9 - 12 with baghouse.

**A.4 FESOP Applicability [326 IAC 2-8-2]**

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

**A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

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Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)]

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This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

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Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

---

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

---

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized

individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

---

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
- (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are

available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)  
or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers

and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

---

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

---

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

### **C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

---

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

### **C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

---

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

### **C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

---

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

## **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:

- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as

they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) Two (2) natural gas fired boilers identified as EU1 and EU2, constructed in 1949 and each rated at 8.1 million Btu/hour. Boilers EU1 and EU2 use either No. 6 fuel oil or No. 2 fuel oil as a back up fuel.
- (b) One (1) natural gas fired boiler, identified as EU3, constructed in 1961 and rated at 9.0 million Btu/hr. Boiler EU3 uses either No. 6 fuel oil or No. 2 fuel oil as a back up fuel.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from all facilities used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input. Therefore, the three (3) boilers (identified as EU1, EU2, and EU3) shall not exceed 0.8 lbs of PM per MMBtu.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 2-8]

Pursuant to 326 IAC 2-8 (FESOP)

- (a) The combined input of No. 6 fuel oil in the two 8.1 MMBtu per hour boilers (identified as EU1 and EU2) and one 9.0 MMBtu per hour boiler (identified as EU3) shall not exceed 848,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. For purpose of determining compliance with this limit, one (1) gallon of No. 2 fuel oil shall be considered equivalent to 0.904 gallons of No. 6 fuel oil, based on sulfur dioxide emissions.
- (b) The sulfur content of the fuel oil shall not exceed one and five-tenths percent (1.5%) by weight.

These limits are equivalent to potential to emit of SO<sub>2</sub> equal to 99.9 tons per year.

Compliance with these limits renders 326 IAC 2-7(Part 70 Permit Program) not applicable.

#### D.1.3 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations), the SO<sub>2</sub> emissions from the three (3) boilers burning fuel oil shall each not exceed five tenths (0.5) pounds per MMBtu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be determined on a calendar month average.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.1.5 Sulfur Dioxide Emissions and Sulfur Content

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Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five tenths (0.5) pounds per million Btu heat input by:
  - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the two 8.1 MMBtu/hr and one 9.0 MMBtu/hr boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **D.1.6 Visible Emissions Notations**

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- (a) Visible emission notations of the boiler stack exhaust for the two 8.1 MMBtu/hr and the one 9.0 MMBtu/hr boilers shall be performed once per shift during normal daylight operations when burning fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### **D.1.7 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period.

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the boiler stack exhaust for the two 8.1 MMBtu/hr and one 9.0 MMBtu/hr boiler once per shift.
- (c) To document compliance with Condition D.1.4, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.8 Reporting Requirements

- (a) When fuel oil is combusted and fuel supplier certifications are used to demonstrate compliance with Condition D.1.2, records of fuel supplier certifications and a certified statement that the records of the fuel supplier certifications represent all of the fuel combusted during the period shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit within thirty (30) days after the end of the quarter being reported.
- (b) A quarterly summary of the information to document compliance with Condition D.1.2 and D.1.3 shall be submitted to the address(es) listed in Section C - General Reporting Requirements of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

## **SECTION D.2**

## **FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-8-4(10)]:**

- (c) Marbits Line (Lines 6, 7, and 8) sugar storage bin with two (2) baghouses.
- (d) Dried Marshmallow Bits Production Department (Lines 6-8).
  - (1) Line 6 & 7 kitchen area - five (5) cook kettles with wet rotoclone.
  - (2) Line 6 Production.
    - (A) Extruder, starch drum, cooling drum with baghouse.
    - (B) Vac-U-Max transfer system with baghouse.
    - (C) Proctor Schwartz dryer with baghouse.
  - (3) Line 7 Production
    - (A) Extruder, starch drum, cooling drum with baghouse
    - (B) Vac-U-Max transfer system with baghouse
    - (C) Proctor-Schwartz dryer with baghouse
  - (4) Line 8 Production
    - (A) Extruder, starch drum, cooling drum with baghouse
    - (B) Vac-U-Max transfer system with baghouse
    - (C) Proctor Schwartz dryer with baghouse
- (e) A confectionary process line 13 producing marshmallow bits, with a dust collector as control.

**Insignificant Activities:**

- (a) Caramels Department
  - (1) System a-b; four (4) cook kettles with wet rotoclones.
  - (2) System c-d; four (4) cook kettles with wet rotoclones.
- (b) Sugar Handling
  - (1) Four (4) storage silos for rail car unloading with baghouse.
  - (2) Carmel/Marshmallow sugar in plant storage bin with baghouse.
  - (3) Two (2) sugar receiving hoppers for marshmallow lines 8-12 with baghouse on each.
  - (4) Two (2) sugar weigh hoppers for caramel department and (2) sugar weigh hoppers for marshmallow lines (Lines 1-5).
- (c) Marshmallow Production Department (Lines 1-5)
  - (1) Kitchen Area
    - (A) Lines 1 & 2 - four (4) cook kettles with wet rotoclones
    - (B) Lines 3 & 4 and the Creme line - four (4) cook kettles with wet rotoclones
  - (2) Extruders, starch drums, cooling drums, baggers and one (1) starch silo, with seven (7) baghouses
  - (3) One (1) starch bag dump station with (1) baghouse
  - (4) Four (4) Vac-U-Max transfer systems with four (4) baghouses.
- (d) Clean-up systems
  - (1) Marshmallow extrusion area Spencer Vacuum Cleaner System with cyclone and bag filter
  - (2) Marbit extrusion area Spencer Vacuum Cleaner System with cyclone and bag filter.

**Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities (Continued)**

(e) Marshmallow Production Department (Lines 9 - 12)

- (1) Line 9 - 12 kitchen area - nine (9) cook kettles with two (2) wet rotoclones.
- (2) Extruders, starch drums, cooling drums for lines 9-12 with four (4) baghouses.
- (3) Five (5) Vac-U-Max transfer systems with four (4) baghouses.
- (4) Baggers for lines 9 - 12 with baghouse.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

**D.2.1 Particulate [326 IAC 2-8] [326 IAC 2-2]**

Pursuant to 326 IAC 2-8, the potential to emit of PM10 from the confectionary process line 13 shall not exceed 2.99 pounds of PM10 per hour. This limit is equivalent to 13.1 tons per year.

Compliance with this limit renders 326 IAC 2-7 (Part 70 Program) not applicable to the source and ensures a PSD minor source status for PM.

**D.2.2 Particulate [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the confectionary operation lines 1-4, 6-12, and confectionary process line 13 shall not exceed the limits listed in the table below.

Emission Units	Process Weight (ton/hr)	Particulate Emission Limit (lb/hr)
Line 1	1.405	5.15
Line 2	1.405	5.15
Line 3	1.405	5.15
Line 4	1.405	5.15
Line 6	1.5	5.38
Line 7	1.5	5.38
Line 8	1.11	4.40
Line 9	1.67	5.78
Line 10	1.31	4.91
Line 11	1.31	4.91
Line 12	2.55	7.68
Line 13	0.63	2.99

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### **D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control device.

### **Compliance Determination Requirements**

#### **D.2.4 Particulate Control**

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In order to comply with D.2.1 and D.2.2, the baghouses and dust collector for particulate control shall be in operation and control emissions from the process lines 1-4, 6-12, and process line 13, at all times that the process lines 1-4, 6-12, and process line 13 are in operation.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.2.5 Visible Emissions Notations**

---

- (a) Visible emission notations of the confectionary process line 13 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### **D.2.6 Parametric Monitoring**

---

The Permittee shall record the total static pressure drop across the dust collector used in conjunction with the confectionary process line 13, at least once per shift when the confectionary process line 13 is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the dust collector is outside the normal range of 0.5 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **D.2.7 Baghouse/Dust Collector Inspections**

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An inspection shall be performed each calendar quarter of all bags/dust collectors controlling the confectionary process line 13 when venting to the atmosphere. A dust collector inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

#### **D.2.8 Broken or Failed Bag/Dust Collector Detection**

---

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.2.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of visible emission notations of the confectionary process line 13 stack exhaust once per shift.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.
- (d) To document compliance with Condition D.2.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS**

#### **Facility Description [326 IAC 2-8-4(10)]:**

- (f) A central vacuum system with one (1) baghouse for controlling plant air emissions.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### **Emission Limitations and Standards**

#### **D.3.1 Particulate [326 IAC 2-8]**

Pursuant to 326 IAC 2-8, the potential to emit of PM10 from the central vacuum system shall not exceed 1.14 pounds of PM10 per hour. This limit is equivalent to 5.0 tons per year.

Compliance with this limit renders 326 IAC 2-7 (Part 70 Program) not applicable to the source.

#### **D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for this facility and its control device.

### **Compliance Determination Requirements**

#### **D.3.3 Particulate Control**

In order to comply with Condition D.3.1, the baghouse for particulate control shall be in operation and control emissions from the central vacuum system at all times the central vacuum system is in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Kraft Foods North America, Inc.  
Source Address: 151 West Ohio Street, Kendallville, Indiana 46755  
Mailing Address: 151 West Ohio Street, Kendallville, Indiana 46755  
FESOP No.: 113-14608-000117

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Affidavit (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Kraft Foods North America, Inc.  
Source Address: 151 West Ohio Street, Kendallville, Indiana 46755  
Mailing Address: 151 West Ohio Street, Kendallville, Indiana 46755  
FESOP No.: 113-14608-000117

**This form consists of 2 pages**

**Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE DATA SECTION**  
**FESOP Quarterly Report**

Source Name: Kraft Foods North America, Inc.  
Source Address: 151 West Ohio Street, Kendallville, Indiana 46755  
Mailing Address: 151 West Ohio Street, Kendallville, Indiana 46755  
FESOP No.: 113-14608-000117  
Facility: Two (2) 8.1 MMBtu/hr boilers, one (1) 9.0 MMBtu boiler  
Parameter: Fuel oil usage and sulfur content by weight  
Limit: Fuel usage 848,000 gallons of No. 6 fuel oil per twelve (12) consecutive month period.  
For the purpose of determining compliance with this limit, one (1) gallon of No. 2 fuel oil shall be considered equivalent to 0.904 gallons of No. 6 fuel oil.  
Sulfur content: 1.5% by weight

Month: \_\_\_\_\_ Year: \_\_\_\_\_

Month	Sulfur Content (%)	Heat Content	Fuel oil usage (gal/month)	SO <sub>2</sub> Emissions (lb/MMBTU)	12 Month Total Fuel Usage (gals)

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Kraft Foods North America, Inc.  
Source Address: 151 West Ohio Street, Kendallville, Indiana 46755  
Mailing Address: 151 West Ohio Street, Kendallville, Indiana 46755  
FESOP No.: 113-14608-000117

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Appendix A: Emission Calculations**  
**Three (3) Natural Gas Fired Boilers (EU1, EU2 and EU3)**

**Company Name:** Kraft Foods North America, Inc.

**Address:** 151 West Ohio Street, Kendallville, Indiana 46755

**SPR:** 113-17246

**Pit ID:** 113-00017

**Reviewer:** ERG/SD

**Date:** September 3, 2003

Heat Input Capacity  
MMBtu/hour

Potential Throughput  
MMCF/year

25.2 (3 Units Total)

220.8

Pollutant						
Emission Factor (lb/MMCF)	PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	7.6	7.6	0.6	100	5.5	84.0
				**see below		
Potential To Emit (tons/year)	0.84	0.84	0.07	11.0	0.61	9.27

\*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

\*\*Emission factors for NO<sub>x</sub>: Uncontrolled = 100 lb/MMCF

Emission factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

MMCF = 1,000,000 Cubic Feet of Gas

#### **METHODOLOGY**

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hr) \* 8760 hours/year \* 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) \* Emission Factor (lb/MMCF) \* 1 ton//2000 lbs

See page 2 for HAPs emissions calculations.

**Appendix A: Emission Calculations**  
**Three (3) Natural Gas Fired Boilers (EU1, EU2 and EU3)**

**Company Name:** Kraft Foods North America, Inc.

**Address:** 151 West Ohio Street, Kendallville, Indiana 46755

**SPR:** 113-17246

**Pit ID:** 113-00017

**Reviewer:** ERG/SD

**Date:** September 3, 2003

**HAPs - Organics**

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	2.32E-04	1.32E-04	8.28E-03	1.99E-01	3.75E-04

**HAPs - Metals**

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential To Emit (tons/year)	5.52E-05	1.21E-04	1.55E-04	4.19E-05	2.32E-04

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations**  
**Three (3) Boilers (EU1, EU2, and EU3) Using No. 2 Fuel Oil**

**Company Name:** Kraft Foods North America, Inc.  
**Address:** 151 West Ohio Street, Kendallville, Indiana 46755  
**SPR:** 113-17246  
**Pit ID:** 113-00017  
**Reviewer:** ERG/SD  
**Date:** September 3, 2003

Heat Input Capacity  
MMBtu/hour

Potential Throughput  
kgals/year

S = Weight % Sulfur  
1.5

25.2 (3 Units Total)

1523

Emission Factor (lb/kgal)	Pollutant				
	PM/PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	2.0	213 (142.0 S)	20.0	0.34	5.0
Potential To Emit (tons/year)	1.52	162	15.2	0.26	3.81

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal. Assume all PM emissions are equal to PM10.  
Note: Emission factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 ( SCC 1-03-005-01/02/03) Supplement E 9/98.  
1 gallon of No. 2 fuel oil has a heating value of 144905 Btu per gallon.

**METHODOLOGY**

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) \* 8760 hours/year \* 1 kgal/1000 gal \* 1 gal/0.144905 MMBtu  
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) \* Emission Factor (lb/kgal) \* 1 ton/2000 lbs

See page 4 for HAPs emissions calculations.

**Appendix A: Emission Calculations**  
**Two (2) Boilers (B03 and B04) Using No. 2 Fuel Oil**

**Company Name:** Kraft Foods North America, Inc.

**Address:** 151 West Ohio Street, Kendallville, Indiana 46755

**SPR:** 113-17246

**Pit ID:** 113-00017

**Reviewer:** ERG/SD

**Date:** September 3, 2003

**HAPs - Metals**

Emission Factor (lb/MMBtu)	Arsenic 4.0E-06	Beryllium 3.0E-06	Cadmium 3.0E-06	Chromium 3.0E-06	Lead 9.0E-06
Potential To Emit (tons/year)	4.4E-04	3.3E-04	3.3E-04	3.3E-04	9.9E-04

**HAPs - Metals (continued)**

Emission Factor (lb/MMBtu)	Mercury 3.0E-06	Mangamese 6.0E-06	Nickel 3.0E-06	Selenium 1.5E-05
Potential To Emit (tons/year)	3.3E-04	6.6E-04	3.3E-04	1.7E-03

No data was available in AP-42 for organic HAPs.

**METHODOLOGY**

Potential To Emit (tons/year) = Heat Input Capacity (MMBtu/hr) \* Emission Factor (lb/MMBtu) \* 8760 hours/year \* 1 ton/2000lb

**Appendix A: Emission Calculations**  
**Three (3) Boilers (Eu1, EU2, and EU3) with Fuel Usage Limit on No. 2 Fuel Oil**

**Company Name:** Kraft Foods North America, Inc.

**Address:** 151 West Ohio Street, Kendallville, Indiana 46755

**SPR:** 113-17246

**Pit ID:** 113-00017

**Reviewer:** ERG/SD

**Date:** September 3, 2003

Heat Input Capacity  
MMBtu/hr

Fuel Usage Limit  
kgals/year

S = Weight % Sulfur

1.5

25.2

(3 Units Total)

938

	Pollutant				
	PM/PM10*	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
Emission Factor (lb/kgal)	2.0	213 (142 S)	20.0	0.34	5.0
Limited PTE (tons/year)	0.94	99.9	9.38	0.16	2.35

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal. Assume all PM emissions are equal to PM10.

Note: Emission factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 ( SCC 1-03-005-01/02/03) Supplement E 9/98

**METHODOLOGY**

Fuel Usage Limit = 848 kgals per year or 8,48,000 gallons per year

Limited PTE (tons/year) = Fuel Usage Limit (kgals/year) \* Emission Factor (lb/kgal) \* 1 ton/2000 lbs

**Appendix A: Emission Calculations**  
**Three (3) Boilers (EU1, EU2, and EU3) Using No. 6 Fuel Oil**

**Company Name:** Kraft Foods North America, Inc.  
**Address:** 151 West Ohio Street, Kendallville, Indiana 46755  
**SPR:** 113-17246  
**Pit ID:** 113-00017  
**Reviewer:** ERG/SD  
**Date:** September 3, 2003

Heat Input Capacity  
MMBtu/hour

Potential Throughput  
kgals/year

S = Weight % Sulfur  

1.5

25.2

 (3 Units Total)

1472

Pollutant					
	**PM	SO <sub>2</sub>	NOx	VOC	CO
Emission Factor (lb/kgal)	17.0 *see below	235.5 (157.0 S)	55.0	1.13	5.0
Potential To Emit (tons/year)	12.5	173	40.5	0.83	3.68

\*\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.5 lb/kgal. Assume all PM emissions are equal to PM10.

\*PM emission factor for #6 fuel oil is 9.19 (S) + 3.22 lb/kgal

1 gallon of No. 6 fuel oil has a heating value of 150,000 Btu per gallon.

Emission Factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 ( SCC 1-03-004-02/03, 1-02-004-02/03, and 1-03-004-04) Supplement E 9/98.

**METHODOLOGY**

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hour) \* 8760 hours/year \* 1 kgal/1000 gal x 1 gal/0.150 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) \* Emission Factor (lb/kgal) \* 1 ton/2000 lbs

**Appendix A: Emission Calculations**  
**Three (3) Boilers (EU1, EU2, and EU3) with Fuel Usage Limit on No. 6 Fuel Oil**

**Company Name:** Kraft Foods North America, Inc.  
**Address:** 151 West Ohio Street, Kendallville, Indiana 46755  
**SPR:** 113-17246  
**Pit ID:** 113-00017  
**Reviewer:** ERG/SD  
**Date:** September 3, 2003

Heat Input Capacity  
MMBtu/hr

Fuel Usage Limit  
kgals/year

S = Weight % Sulfur  
1.5

25.2 (3 Units Total)

848

Emission Factor in lb/kgal	Pollutant				
	PM** 17.0 *see below	SO <sub>2</sub> 236 (157 S)	NOx 55.0	VOC 1.13	CO 5.0
Limited PTE (tons/year)	7.21	99.9	23.3	0.48	2.12

\*\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.5 lb/kgal. Assume all PM emissions are equal to PM10.

\*PM emission factor for #6 fuel oil is 9.19 (s) + 3.22 lb/kgal

1 gallon of No. 6 fuel oil has a heating value of 150,000 Btu

Emission Factors are from AP-42, Tables 1.3-1, 1.3-2, and 1.3-3 ( SCC 1-03-004-02/03, 1-02-004-02/03, and 1-03-004-04) Supplement E 9/98.

**METHODOLOGY**

Fuel Usage Limit = 848 kgals per year or 848,000 gallons per year

Limited PTE (tons/year) = Fuel Usage Limit (kgals/year) \* Emission Factor (lb/kgal) \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
PM/PM10 Emissions  
From Confectionary Process Lines**

**Company Name:** Kraft Foods North America, Inc.  
**Address:** 151 West Ohio Street, Kendallville, Indiana 46755  
**SPR:** 113-17246  
**Plt ID:** 113-00017  
**Reviewer:** ERG/SD  
**Date:** September 3, 2003

Control Efficiency = 99%		Controlled Emissions		
Process Line No	Max. Throughput Rate (ton/hour)	* Emission Factor (lb/ton)	PTE PM/PM10 (lbs/hour)	PM/PM10 (tons/year)
6	1.50	70	1.05	4.60
7	1.50	70	1.05	4.60
8	1.11	70	0.78	3.40
1	1.41	70	0.98	4.31
2	1.41	70	0.98	4.31
3	1.41	70	0.98	4.31
4	1.41	70	0.98	4.31
9	1.67	70	1.17	5.12
10	1.31	70	0.92	4.02
11	1.31	70	0.92	4.02
12	2.55	70	1.79	7.82
<b>TOTAL</b>			<b>50.8</b>	

Assume all PM emissions are equal to PM10 emissions

Control = The (11) baghouses used in conjunction with the eleven (11) confectionary process lines are considered integral to control.

**\* NOTE:**

There are no available emission factors available for confectionary processing.

The source submitted emission rate data from a stack test result conducted at a similar facility in MI. However, in order to assume the worst case scenario, an emission factor from AP-42, Chapter 9.9.1, Table 9.9.1-2, Wheat Milling - SCC 3-02-007-34 (5/98) was used.

**METHODOLOGY**

**Controlled Emissions**

PTE of PM/PM10 (lbs/hour) = Max. Throughput Rate (ton/hour) \* Emission Factor (lb/ton)

PTE of PM/PM10 (tons/year) = Max. Throughput Rate (ton/hour) \* Emission Factor (lb/ton) \* 8760 hours/year \* 1 ton/2000 lbs

**Appendix A : Emission Calculations  
PM/PM10 Emissions  
From Central Vacuum System**

**Company Name:** Kraft Foods North America, Inc.  
**Address:** 151 West Ohio Street, Kendallville, Indiana 46755  
**SPR:** 113-17246  
**Plt ID:** 113-00017  
**Reviewer:** ERG/SD  
**Date:** September 3, 2003

**POTENTIAL TO EMIT OF PM/PM10 FROM CENTRAL VACUUM SYSTEM WITH A BAGHOUSE**

		After Control	Before Control	
		PTE PM/PM10 (ton/year)	PTE PM/PM10 (ton/year)	PTE PM/PM10 (lb/hr)
* PM Control Equipment = Baghouse				
Grain Loading in grains/acf =	0.006	0.96	95.8	21.9
Air Flow Rate in acf/min =	4176			
Control Efficiency in % =	99%			

\* Assume all PM emissions are equal to PM10 emissions

**METHODOLOGY**

**After Control**

PTE PM/PM10 (ton/year) = Grain loading (grains/acf) \* Air flow rate (acf/min) \* 60 min/hour \* 1 lb/7000 grains \* 8760 hour/year \* 1ton /2000 lbs

**Before Control**

PTE PM/PM10 (ton/year) = Grain loading (grains/acf) \* Air flow rate (acf/min) \* 60 min/hour \* 1 lb/7000 grains \* 8760 hour/year \* 1ton /2000 lbs \* 1/(1-Control efficiency % )

PTE PM/PM10 (lbs/hour) = Grain loading (grains/acf) \* Air flow rate (acf/min) \* 60 min/hour \* 1 lb/7000 grains \* 1/(1-Control efficiency % )

**Appendix A : Emission Calculations  
PM/PM10 Emissions  
From Process Lines 13**

**Company Name:** Kraft Foods North America, Inc.  
**Address:** 151 West Ohio Street, Kendallville, Indiana 46755  
**SPR:** 113-17246  
**Plt ID:** 113-00017  
**Reviewer:** ERG/SD  
**Date:** September 3, 2003

Process Line No	Max. Throughput Rate (ton/hour)	* Emission Factor (lb/ton)	Control Efficiency (%)	Before Control		After Control
				PTE PM/PM10 (lbs/hour)	PTE PM/PM10 (tons/year)	PTE PM/PM10 (tons/year)
13	0.63	70	99%	43.8	192	1.92
<b>TOTAL</b>					<b>192</b>	<b>1.92</b>

Assume all PM emissions are equal to PM10 emissions

Control = One (1) dust collector with 99% control efficiency

**\* NOTE:**

There are no available emission factors available for confectionary processing.

The source submitted emission rate data from a stack test result conducted at a similar facility in MI. However, in order to assume the worst case scenario, an emission factor from AP-42, Chapter 9.9.1, Table 9.9.1-2, Wheat Milling - SCC 3-02-007-34 (5/98) was used.

**METHODOLOGY**

PTE of PM/PM10 (lbs/hour) = Max. Throughput Rate (ton/hour) \* Emission Factor (lb/ton)

PTE of PM/PM10 Before Controls (tons/year) = Max.Throughput Rate (ton/hour) \* Emission Factor (lb/ton) \* 8760 hours/year \* 1 ton/2000 lbs

PTE of PM/PM10 After Controls (tons/year) = Max.Throughput Rate (ton/hour) \* Emission Factor (lb/ton) \* 8760 hours/year \* 1 ton/2000 lbs \* (1- Control Efficiency %)

**Appendix A: Emission Calculations  
Summary**

**Company Name:** Kraft Foods North America, Inc.

**Address:** 151 West Ohio Street, Kendallville, Indiana 46755

**SPR:** 113-17246

**Plt ID:** 113-00017

**Reviewer:** ERG/SD

**Date:** September 3, 2003

**POTENTIAL TO EMIT IN TONS PER YEAR BEFORE CONTROLS**

<b>Emission Units</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
Boilers Burning Natural Gas	0.84	0.84	0.07	11.0	0.61	9.27	Negligible
Boilers Burning No.2 Fuel Oil	1.52	1.52	162	15.2	0.26	3.81	Negligible
Boilers Burning No.6 Fuel Oil	12.5	12.5	173	40.5	0.83	3.68	
<i>Worst Case Emissions from Boilers</i>	12.5	12.5	173	15.2	0.83	9.27	Negligible
Process Lines 1 through 4, and 6 through 12	50.8	50.8					
<b>Total Source Emissions From Existing Units</b>	<b>63.3</b>	<b>63.3</b>	<b>173</b>	<b>15.2</b>	<b>0.83</b>	<b>9.27</b>	
Central Vacuum System	95.8	95.8					
Process Line 13	192	192					
<b>Total Source Emissions Including Modification</b>	<b>351</b>	<b>351</b>	<b>173</b>	<b>15.2</b>	<b>0.83</b>	<b>9.27</b>	

**POTENTIAL TO EMIT IN TONS PER YEAR AFTER CONTROLS AND A FUEL USAGE LIMIT ON THE FUEL OIL BURNED**

<b>Emission Units</b>	<b>PM</b>	<b>PM10</b>	<b>SO<sub>2</sub></b>	<b>NOx</b>	<b>VOC</b>	<b>CO</b>	<b>HAPs</b>
Boilers Burning Natural Gas	0.84	0.84	0.07	11.0	0.61	9.27	Negligible
Boilers Burning No.2 Fuel Oil	0.94	0.94	99.9	9.38	0.16	2.35	Negligible
Boilers Burning No.6 Fuel Oil	7.21	7.21	99.9	23.3	0.48	2.12	
<i>Worst Case Emissions from Boilers</i>	<b>7.21</b>	<b>7.21</b>	<b>99.9</b>	<b>23.3</b>	<b>0.61</b>	<b>9.27</b>	Negligible
Process Lines 1 through 4, and 6 through 12	50.8	50.8					
<b>Total Source Emissions From Existing Units</b>	<b>58.0</b>	<b>58.0</b>	<b>99.9</b>	<b>23.3</b>	<b>0.61</b>	<b>9.3</b>	
** Central Vacuum System	5.00	5.00					
* Process Line 13	13.1	13.1					
<b>Total Source Emissions Including Modification</b>	<b>76.1</b>	<b>76.1</b>	<b>99.9</b>	<b>23.3</b>	<b>0.61</b>	<b>9.27</b>	

\* New confectionary process line 13 is limited to 13.1 tons per year in order to limit PTE of PM and PM10 from the entire source to less than 250 and 100 tons per year, respectively.

**Appendix A: Emission Calculations**  
**Allowable Emissions From Boilers**

**Company Name:** Kraft Foods North America, Inc.

**Address:** 151 West Ohio Street, Kendallville, Indiana 46755

**SPR:** 113-17246

**Plt ID:** 113-00017

**Reviewer:** ERG/SD

**Date:** September 3, 2003

Unit	Heat Input Q (MMBtu/hour)	Stack Height (ft)
EU1	8.1	33.4
EU2	8.1	35.11
EU3	9	41.6

C (ug/m3)	50
a	0.67
*Average h (ft)	36.9
N	3
Q	25.2

**\*Pt (lbs/MMBtu) =** 1.09

**METHODOLOGY**

\*Pt =  $((C \cdot a \cdot h) / (76.5 \cdot (Q^{0.75}) \cdot (N^{0.25})))$

\*\*\* Average h (ft) =  $\text{summation } i = 1 \text{ to } N (P_{a_i} \times h_i \times Q_i) / \text{Summation } i = 1 \text{ to } N (P_{a_i} \times Q_i)$